

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BRIAN HUDDLESTON,

Plaintiff,

vs.

**FEDERAL BUREAU OF
INVESTIGATION and UNITED STATES
DEPARTMENT OF JUSTICE**

Defendant

Case No. 4:20-cv-447-ALM

DECLARATION OF TY CLEVINGER

My name is Ty Clevenger, I am greater than 18 years of age and competent to testify, and I do testify as follows under penalty of perjury under the laws of the United States, as witnessed by my signature below:

- (1) I am the attorney representing Brian Huddleston in the case identified above.
- (2) The information in my February 2, 2023 declaration (Dkt. #96-1) is true and correct, as is the information in my April 25, 2022 declaration (Dkt. #52-1).
- (3) Since February 2, 2023 I have accrued another \$48,650 in fees while representing Mr. Huddleston, plus \$70.91 in expenses. A true and correct invoice reflecting those fees and costs is attached to this declaration.
- (4) I believe \$500 per hour is a reasonable rate given my level of experience, and I believe \$164,302.56 is a reasonable charge for my total services thus far.

THE DECLARANT SAYS NOTHING FURTHER.

January 12, 2024


Ty Clevenger

Ty Clevenger
 212 S. Oxford Street #7D
 Brooklyn, New York 11219
tyclevenger@yahoo.com

INVOICE

January 12, 2024

Date	Time	Expense	Purpose
		\$115,581.65	Prior unpaid invoices
2/13/2023	0.8		Review status of record and send email to A. Parker
2/14/2023	6.9		Legal research; draft response to supplemental MSJ
2/15/2023	1.4		Review R. Stone docket;
2/18/2023	2.9		Research and draft MSJ response
2/19/2023	2.3		Research and draft MSJ response
2/20/2023	11.9		Research and draft MSJ response
2/21/2023	6.5		Finalize and file MSJ response
2/22/2023	0.5		Prepare and submit chambers copy
2/25/2023	0.6		Legal research on code names
2/28/2023	0.3		Review FBI reply
3/6/2023	0.2		Review court order on attorney fees
3/7/2023	0.4		Motion for extension
3/9/2023	0.3		Teleconf. w/ M. Couch about revelations in Nordean case
3/12/2023	2.9		Legal research; draft sur-reply
3/13/2023	2		Draft sur-reply; review records from LA case
3/16/2023	1.1		Draft motion for reconsideration
4/5/2023	3		Draft MSJ
4/6/2023	3.5		Draft MSJ
4/7/2023	2.9		Finish and file MSJ; draft motion to supplement
4/8/2023	2		File corrected MSJ and motion for leave to file supplemental complaint
5/12/2023	0.4		Confer w/ A. Parker; draft and file motion for stay
7/12/2023	0.3		Review file; status of case
7/14/2023	0.6		Review reports possibly leading to new records;
8/5/2023	3.9		Draft reply ISO MSJ
8/16/2023	3.5		Draft reply ISO MSJ
8/17/2023	6		Draft reply ISO MSJ; email colleagues w/ question
8/18/2023	5.5		Draft & file motion for extension; draft and file reply ISO supplemental complaint
8/21/2023	6.1		Extended conversation with Y. Applebaum about malware; rewrite reply ISO supplemental complaint; motion for leave to file excess pages
8/24/2023	2		Draft reply brief for MSJ

8/25/2023	6.7		Draft and file motion for leave to file excess pages; finish and file reply ISO MSJ
1/5/2024	1.1		Draft response to 11/28/23 order; email J. Gillingham
1/6/2024	1.2		Legal research; draft proposed production schedule
1/7/2024	1.1		Draft proposed production schedule
1/8/2024	0.5		Draft declaration for Y. Apfelbaum and email for review
1/9/2024	3.9		Legal research; update Apfelbaum declaration; update draft production schedule; draft motion to clarify; draft fee motion
2/13/2023	0.8		Review status of record and send email to A. Parker
2/14/2023	6.9		Legal research; draft response to supplemental MSJ
2/15/2023	1.4		Review R. Stone docket;
2/18/2023	2.9		Research and draft MSJ response
2/19/2023	2.3		Research and draft MSJ response
2/20/2023	11.9		Research and draft MSJ response
2/21/2023	6.5		Finalize and file MSJ response
2/22/2023	0.5	\$70.91	Prepare, print, and submit chambers copy
2/25/2023	0.6		Legal research on code names
2/28/2023	0.3		Review FBI reply
3/6/2023	0.2		Review court order on attorney fees
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7/14/2023	0.6		Review reports possibly leading to new records;
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8/25/2023	6.7		Draft and file motion for leave to file excess pages; finish and file reply ISO MSJ
1/5/2024	1.1		Draft response to 11/28/23 order; email J. Gillingham
1/6/2024	1.2		Legal research; draft proposed production schedule
1/7/2024	1.1		Draft proposed production schedule
1/8/2024	0.5		Draft declaration for Y. Apelbaum and email for review
1/9/2024	3.9		Legal research; update Apelbaum declaration; update draft production schedule; draft motion to clarify; draft fee motion
1/11/2024	2.1		Confer w/ J. Gillingham; Westlaw research; respond to latest FBI stunt

Total		\$115,652.56
	97.3 hrs. x	
	500 / hr =	<u>\$48,650.00</u>
Grand Total		\$164,302.56